

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Part 97 of the Commission's)	
Amateur Radio Service Rules to Eliminate)	RM - 10786
Morse Code Proficiency Testing Requirements)	
For All Classes of Amateur Licenses)	
)	
To: The Commission)	

Comments Of Bradford A. Wagoner (KD5WCL)

The purpose of these comments is to support the associated petition of No Code International ("NCI") recommending the elimination of the existing Morse code proficiency requirement from the Commission's Part 97 rules for ALL classes of amateur license issued by the Commission.

1. Morse code has virtually no practical place in any modern radio service. While it is a historic curiosity, and should continue to be permitted, operator proficiency adds nothing to the reliability or functionality of the amateur radio service.
2. The continued use of Morse code will actually inhibit international communications, especially with operators in countries that do not require proficiency
3. With the recent elimination of Morse proficiency by the ITU, the Commission is no longer bound to require such proficiency by American licensees.
4. The continuation of Morse proficiency creates an impediment for potential licensees who are disabled and unable to either learn, or to physically execute, the arcane skill.
5. It is not in the public interest for the Commission to impose more onerous and unnecessary burdens on those seeking a Commission-issued amateur radio license than would be faced by equally qualified individuals in other countries. This will unnecessarily limit the pool of operators available for emergency communications.
6. The Commission has the authority to amend its Part 97 rules to eliminate Morse proficiency requirements by expedited order, without formal notice and public input.
7. The Commission should refrain from combining NCI's request for the prompt elimination of Morse test requirements from its rules with other substantially unrelated issues such as, but not limited to, band segmentation, changes in the number of license classes, sweeping

changes in operator privileges by license class, etc., because that would result in unnecessary, protracted delay in resolving this important and clear-cut issue.

Respectfully submitted,

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